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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In Re
PG&E CORPORATION
v.
AECOM TECHNICAL SERVICES, INC.

Case No. 4:20-cv-05381-HSG (Lead Case)

(Reference withdrawn from Bankruptcy
Case No. 19-30088, Adv. Proc. No. 20-
03019 and Adv. Proc. No. 19-03008)

(Consolidated with Case No. 3:20-cv-
08463-EMC)

**JOINT NOTICE OF SETTLEMENT
AS TO PACIFIC GAS & ELECTRIC
COMPANY AND AECOM
TECHNICAL SERVICES, INC. ONLY**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PACIFIC GAS & ELECTRIC COMPANY ("PG&E") and AECOM TECHNICAL SERVICES, INC. ("AECOM") (collectively, the "Parties"), wish to inform the Court that they have reached a settlement in principle in the above-captioned matter as to PG&E and AECOM only. The Parties are in the process of drafting a settlement agreement to reflect the final terms. The Parties jointly request that the Court stay the following upcoming hearings pending finalization of the settlement and dismissal of claims between AECOM and PG&E:

- 1 1. PG&E's Motion to Dismiss/Strike AECOM's Second Amended Counterclaim
- 2 Hearing on November 4, 2021 at 2:00 p.m.;
- 3 2. AECOM and PG&E's Joint Discovery Letter Hearings (two letters have been
- 4 submitted – one is set for hearing on October 28, 2021 at 1:00 p.m., the other is not
- 5 yet calendared);
- 6 3. PG&E's Rule 54 Motion Hearing (as to AECOM only) on December 2, 2021 at
- 7 2:00 p.m.

8 AECOM and PG&E anticipate being able to file dismissals as they relate to each other in
9 the next thirty (30) days. The case will continue to proceed as to the claims asserted between
10 AECOM and JH KELLY, LLC.

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12 Dated: October 18, 2021

TROUTMAN PEPPER HAMILTON
SANDERS LLP

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15 By: /s/ Luke N. Eaton

MARION T. HACK
LUKE N. EATON
WILLIAM TAYLOR
Attorneys for
AECOM TECHNICAL SERVICES,
INC.

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18
19 Dated: October 18, 2021

RALLS GRUBER & NIECE

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21 By: /s/ Aaron Gruber

Aaron Gruber
Dylan J. Crosby
Attorneys for
PACIFIC GAS & ELECTRIC
COMPANY

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25 In accordance with N.D. Cal. L.R. 5-1(i)(3), I hereby attest that I have obtained the
26 concurrence of all other signatories in the filing of this document.

27 Dated: October 18, 2021

28 By: /s/ Luke N. Eaton
Luke N. Eaton